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HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest No. 8073
Activity No.: PER20080001

Mr. Danny Landry
Production Foreman
Texas Petroleum Investment Company
Post Office Box 218
Avery Island, Louisiana 70518

RE: Part 70 Operating Permit, Avery Island Field Wide Unit (FWU) and Compressor Station No. 1,
Texas Petroleum Investment Company, Delcambre, Iberia Parish, Louisiana

Dear Mr. Landry:

This is to inform you that the permit renewal and minor modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2014, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and Agency Interest Number cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2009.

Permit No.: 1260-00069-V3

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN/KAP
cc: EPA Region 6

**AIR PERMIT BRIEFING SHEET
OFFICE OF ENVIRONMENTAL SERVICES
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Avery Island Field Wide Unit (FWU) and Compressor Station No. 1
Agency Interest No. 8073
Texas Petroleum Investment Company
Delcambre, Iberia Parish, Louisiana**

I. Background

Texas Petroleum Investment Company (TPIC) owns and operates the Avery Island Field Wide Unit (FWU) and Compressor Station No. 1 near Delcambre, Iberia Parish under Part 70 Operating Permit No. 1260-00069-V2 issued on May 29, 2007.

II. Origin

A permit application and Emission Inventory Questionnaire dated June 19, 2008 were submitted, requesting a Part 70 operating permit renewal and minor modification. Supplemental information dated January 19, 2009, February 18, 2009, February 19, 2009, February 20, 2009, and March 2, 2009 was also submitted.

III. Description

The Avery Island Field Wide Unit (FWU) and Compressor Station No. 1 is an oil and gas production facility which separates natural gas, oil, and produced water from nearby wellstreams. The wellstreams flow through separators. The gas stream is compressed, dried in a glycol dehydrator, and directed to the sales pipeline. The glycol dehydrator is equipped with a flash separator and condenser. The noncondensables are routed to the dehydrator flare for combustion. Flash separator off gas is routed to the reboiler burner for combustion. The oil stream from the separators is directed to the oil tanks and trucked off as needed. The water stream from the separators is directed to another facility for injection via an electric transfer pump.

The Avery Island FWU & Compressor Station No. 1 is classified as a major stationary source. It is located in Iberia Parish which is in attainment for all regulated pollutants. As such, Non-Attainment New Source Review (NNSR) regulations do not apply.

In this Part 70 Operating Permit, Texas Petroleum Investment Company (TPIC) requested the following changes to its current Part 70 Operating Permit:

1. To renew its Part 70 Operating Permit.
2. To add formaldehyde emissions for the Compressor Engines (Source ID Nos. 11 and 12). All other emissions for these two emission sources will remain the same as currently permitted.
3. To change Source ID No. 10 (Glycol Reboiler – Stills Column), Source ID No. 21 (Glycol Reboiler – Condenser Vent), and Source ID No. 22 (Glycol Reboiler – Flash Separator Vent) to reflect that the stills column emissions are reported at the condenser vent and that the flash separator vent gas emissions are recycled as process fuel.

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4. To update pump emissions from Source ID No. 8 (Chemical Pump), Source ID No. 18 (Sump Pump – Wilden M-2), Source ID No. 19 (Sump Pump – Wilden M-8), and Source ID No. 20 (Sump Pump – Wilden M-4).
5. To add Source ID No. 15 (Compressor Relief Vent) emissions. Emissions are routed through this vent during compressor shutdowns, compressor blowdowns, and cylinder purges.
6. To remove Source ID No. 5 (1000 BBL Saltwater Storage Tank) and Source ID No. 18 (Sump Pump – Wilden M-2) from the permit.

Permitted emission changes in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	0.68	0.67	- 0.01
SO ₂	0.04	0.04	0.00
NO _x	241.91	241.71	- 0.20
CO	60.24	60.07	- 0.17
VOC *	88.58	89.99	+ 1.41

***VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Before	After	Change
Benzene	0.14	0.13	- 0.01
Ethyl Benzene	0.01	0.00	- 0.01
Formaldehyde	-	1.35	+ 1.35
n-Hexane	0.87	0.88	+ 0.01
Toluene	0.08	0.07	- 0.01
Xylene (mixed isomers)	0.08	0.06	- 0.02
Total	1.18	2.49	+ 1.31

Other VOC (TPY):	87.50
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IV. Type of Review

This application was reviewed for compliance with the Louisiana Part 70 operating permit program, Louisiana Air Quality Regulations, and National Emission Standards for Hazardous Air Pollutants (NESHAP). New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD) regulations, and Non-Attainment New Source Review (NNSR) regulations do not apply.

The facility was a major source of Toxic Air Pollutants (TAPs) at the time the LAC 33:III.Chapter 51 was promulgated. Upon routing the still column vent to the condenser and then the flare as Maximum Achievable Control Technology (MACT), the station became a minor source of TAPs subject to LAC 33:III.905, 5105.A.1, 5105.A.3, 5105.A.4, and 5113.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

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VII. Effects on Ambient Air

Emissions associated with the proposed modifications were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

VIII. General Condition XVII Activities

ID No.:	Description	Emissions (tons/year)				
		PM ₁₀	SO ₂	NO _x	CO	VOC
	<None>					

IX. Insignificant Activities (LAC 33:III.501.B.5)

ID No.:	Description	Capacity	Citation
--	Lube Oil Tank	--	A.3
--	Glycol Reboiler Sump	--	A.3
--	Vent Scrubber Sump	--	A.3
--	Glycol Storage Tank	--	A.3

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**Avery Island Field Wide Unit (FWU) and Compressor Station No. 1****Agency Interest No. 8073**

Texas Petroleum Investment Company
Delcambre, Iberia Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.										LAC 33:III.Chapter						
		509	2103	2104	2111	2113	2116	5▲	9	11	13	15	51*	52	56	59		
UNF001	Avery Island FWU & Compressor Station No. 1							1	1	1	1	1	1	1	1	1	3	
EQT001	11 - Compressor Engine – 880 HP (Cooper)								1	1	1	1	1	1	1	1	3	
EQT002	12 - Compressor Engine – 1000 HP (Clark)								1	1	1	1	1	1	1	1	3	
EQT003	1 – 1000 BBL Oil Storage Tank (#17)								2									
EQT004	2 – 1000 BBL Oil Storage Tank (#18)								2									
EQT005	3 – 1000 BBL Drip Tank (#99)								2									
EQT006	4 – 1000 BBL Drip Tank (#99618)								2									
EQT008	6 – 5000 BBL Saltwater Storage Tank (Backup)								2									
EQT009	7 – 1500 BBL Gunbarrel Tank								2									
EQT010	9 - Glycol Reboiler - Stills Column									1	1							
EQT011	10 - Glycol Reboiler - Burner Stack										1	1	1	3				
EQT012	14 - Tank Truck - Loading Losses											1						
EQT013	13 - Dehydrator Flare										1	1	1	1	3			
EQT016	8 - Chemical Pump																	
EQT017	17 - Heater Treater - Vent											1	1	3				
EQT019	19 - Sump Pump - Wilden M-8																	
EQT020	20 - Sump Pump - Wilden M-4																	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**Avery Island Field Wide Unit (FWU) and Compressor Station No. 1**

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Texas Petroleum Investment Company**Delcambre, Iberia Parish, Louisiana****X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

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EQT021	21 - Glycol Reboiler – Condenser Vent															
EQT022	22 - Glycol Reboiler - Flash Separator Vent															
FUG001	F1 - Fugitive Emissions						1									
RLP030	15 – Compressor Relief Vent															

- * The regulations indicated above are State Only regulations.
 ▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the “Specific Requirements” report specifically states that the regulation is State Only.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**Avery Island Field Wide Unit (FWU) and Compressor Station No. 1**

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Texas Petroleum Investment Company

Delcambre, Iberia Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS				40 CFR 61				40 CFR 63				40 CFR			
		A	Dc	K	Ka	Kb	KKK	III	JJJ	A	J	FF	A	HH	ZZZZ	64	68
UNF001	Avery Island FWU & Compressor Station No. 1																3
EQT001	11 - Compressor Engine 880 HP (Cooper)									3	3						3
EQT002	12 - Compressor Engine 1000 HP (Clark)									3	3						3
EQT003	1 – 1000 BBL Oil Storage Tank (#17)									3	3						3
EQT004	2 – 1000 BBL Oil Storage Tank (#18)									3	3						3
EQT005	3 – 1000 BBL Drip Tank (#99)									3	3						3
EQT006	4 – 1000 BBL Drip Tank (#99618)									3	3						3
EQT008	6 – 5000 BBL Saltwater Storage Tank (Backup)									3	3						3
EQT009	7 – 1500 BBL Gunbarrel Tank									3	3						3
EQT010	9 - Glycol Reboiler - Stills Column															2	
EQT011	10 - Glycol Reboiler - Burner Stack																
EQT012	14 - Tank Truck - Loading Losses																
EQT013	13 - Dehydrator Flare																
EQT016	8 - Chemical Pump																
EQT017	17 - Heater Treater - Vent																
EQT019	19 - Sump Pump - Wilden M-8																
EQT020	20 - Sump Pump - Wilden M-4																

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FUG001	F1 - Fugitive Emissions																
RLP030	15 - Compressor Relief Vent																

KEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, and fugitives) but do not apply to this particular emission source.
 Blank - The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Status	Citation	Explanation
UNF001	LAC 33:III.Chapter 59 40 CFR 68	Does not apply	LAC 33:III.5901	Facility does not store or process any referenced list substance greater than the threshold amounts.
EQT001, EQT002	LAC 33:III.Chapter 15 40 CFR 60 Subpart III	Does not apply	LAC 33:III.1502.A.3 40 CFR 60.4200(a)	SO ₂ emissions < 5 tons/year Engines are stationary spark ignition reciprocating internal combustion engines, not stationary compression ignition internal combustion engines
		Does not apply		
	40 CFR 60 Subpart JJJJ	Does not Apply	40 CFR 60.4230(a)(4), (5)	Engines were manufactured, modified, or constructed before June 12, 2006.
	40 CFR 63 Subpart ZZZZ	Does not apply	40 CFR 63.6590(b)(3)	Engines are existing spark ignition 4-stroke rich burn stationary reciprocating internal combustion engines located at an area source
EQT003, EQT004, EQT005, EQT006, EQT008, EQT009	LAC 33:III.2103 for VOC tanks 40 CFR 63 Subpart K 40 CFR 63 Subpart Ka	Exempt Does not apply Does not apply	LAC 33:III.2103.G.1 40 CFR 60.110 40 CFR 60.110a	Volumes < 420,000 gallons Stores crude oil prior to custody transfer Stores crude oil prior to custody transfer
	40 CFR 63 Subpart Kb	Does not apply	40 CFR 60.110b	Stores crude oil prior to custody transfer
EQT010	LAC 33:III.Chapter 15 40 CFR 63 Subpart HH	Does not apply Exempt from control requirements	LAC 33:III.1502.A.3 40 CFR 63.764(e)(1)(ii)	SO ₂ emissions < 5 tons/year Controlled emissions of benzene from the glycol dehydration unit are less than 0.90 megagram (0.99 tons) per year. Recordkeeping requirements of 40 CFR 63.774(d)(1) apply.
EQT011, EQT013 EQT017	LAC 33:III.Chapter 15	Does not apply	LAC 33:III.1502.A.3	SO ₂ emissions < 5 tons/year

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The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section X of this permit

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
 - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];

40 CFR PART 70 GENERAL CONDITIONS

2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

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- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;

40 CFR PART 70 GENERAL CONDITIONS

3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and

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contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]

- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - 1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 - 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 - 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 - 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 - 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 - 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the

40 CFR PART 70 GENERAL CONDITIONS

permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated June 19, 2008, along with supplemental information dated January 19, 2009, February 18, 2009, February 19, 2009, February 20, 2009, and March 2, 2009.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.

- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
 - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
 2. Report by September 30 to cover April through June
 3. Report by December 31 to cover July through September
 4. Report by March 31 to cover October through December
- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]
- These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.
- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

INVENTORIES

AI ID: 8073 - Avery Island FWU & Compressor Station #1
 Activity Number: PER20080001
 Permit Number: 1260-00069-V3
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Avery Island FWU & Compressor Station No. 1						
EQT 0001	11 - Compressor Engine - 880 HP (Cooper)	880 horsepower	880 horsepower	880 horsepower		8760 hr/yr
EQT 0002	12 - Compressor Engine - 1000 HP (Clark)	1000 bbl	1000 horsepower	1000 horsepower		8760 hr/yr
EQT 0003	1 - 1000 BBL Oil Storage Tank (#17)	1000 bbl	250 bbl/day	250 bbl/day	Oil	8760 hr/yr
EQT 0004	2 - 1000 BBL Oil Storage Tank (#18)	1000 bbl	250 bbl/day	250 bbl/day	Oil	8760 hr/yr
EQT 0005	3 - 1000 BBL Drip Tank (#99)	1000 bbl	25 bbl/day	25 bbl/day	Oil	8760 hr/yr
EQT 0006	4 - 1000 BBL Drip Tank (#99618)	1000 bbl	25 bbl/day	25 bbl/day	Oil	8760 hr/yr
EQT 0008	6 - 5000 BBL Saltwater Storage Tank (Backup)	5000 bbl	3000 bbl/day	3000 bbl/day	Water	8760 hr/yr
EQT 0009	7 - 1500 BBL Gunbarrel Tank	1500 bbl	503 bbl/day	503 bbl/day	Oil	8760 hr/yr
EQT 0010	9 - Glycol Reboiler - Stills Column		7 MM ft ³ /day	7 MM ft ³ /day		8760 hr/yr
EQT 0011	10 - Glycol Reboiler - Burner Slack		3 MM BTU/hr	3 MM BTU/hr		8760 hr/yr
EQT 0012	14 - Tank Truck - Loading Losses		182500 bbl/yr	182500 bbl/yr		1825 hr/yr
EQT 0013	13 - Dehydrator Flare		7.44 MM ft ³ /yr	7.44 MM ft ³ /yr		8760 hr/yr
EQT 0016	8 - Chemical Pump		25 scfm/hr	25 scfm/hr		4380 hr/yr
EQT 0017	17 - Heater Treater - Vent		50 bbl/day	50 bbl/day	Oil	8760 hr/yr
EQT 0019	19 - Sump Pump - Wilden M-8		1200 scf/hr	1200 scf/hr		112 hr/yr
EQT 0020	20 - Sump Pump - Wilden M-4		600 scf/hr	600 scf/hr		730 hr/yr
EQT 0021	21 - Glycol Reboiler - Condenser Vent		7 MM ft ³ /day	7 MM ft ³ /day		8760 hr/yr
EQT 0022	22 - Glycol Reboiler - Flash Separator Vent		7 MM ft ³ /day	7 MM ft ³ /day		8760 hr/yr
FUG 0001	F-1 - Fugitive Emissions					
RLP 0030	15 - Compressor Relief Vent		.1 MM ft ³ /day	.1 MM ft ³ /day		168 hr/yr
Stack Information:						
ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)
Avery Island FWU & Compressor Station No. 1						
EQT 0001	11 - Compressor Engine - 880 HP (Cooper)	273.32	1073.33	.5		12
EQT 0002	12 - Compressor Engine - 1000 HP (Clark)	310.59	1219.69	.5		12
EQT 0003	1 - 1000 BBL Oil Storage Tank (#17)	.72	2.12	.25		18
EQT 0004	2 - 1000 BBL Oil Storage Tank (#18)	.72	2.12	.25		18
EQT 0005	3 - 1000 BBL Drip Tank (#99)	.07	.21	.25		18
EQT 0006	4 - 1000 BBL Drip Tank (#99618)	.07	.21	.25		18
EQT 0008	6 - 5000 BBL Saltwater Storage Tank (Backup)	.01	.03	.25		26
EQT 0009	7 - 1500 BBL Gunbarrel Tank	1.45	4.26	.25		80
EQT 0010	9 - Glycol Reboiler - Stills Column		276.39	13.57		10
EQT 0011	10 - Glycol Reboiler - Burner Slack		.06	.7		212
EQT 0012	14 - Tank Truck - Loading Losses					12
						200
						80

INVENTORIES

AI ID: 8073 - Avery Island FWU & Compressor Station #1
 Activity Number: PER20080001
 Permit Number: 1260-00069-V3
 Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
Avery Island FWU & Compressor Station No. 1							
EQT 0013	13 - Dehydrator Flare	1.2	14.16	.5		25	1000
EQT 0016	8 - Chemical Pump	2.01	.09	.03		1.5	80
EQT 0017	17 - Heater Treater - Vent	.04	.42	.25		28	200
EQT 0019	19 - Sump Pump - Wilden M-8	96.35	4.09	.03		1.5	80
EQT 0020	20 - Sump Pump - Wilden M-4	48.17	2.04	.03		1.5	80
EQT 0021	21 - Glycol Reboiler - Condenser Vent	2.97	.15	.25		10	110
EQT 0022	22 - Glycol Reboiler - Flash Separator Vent	94.73	4.65	.25		3	126
RLP 0030	15 - Compressor Relief Vent	5.89	69.44	.5		12	100

Relationships:

ID	Description	Relationship	ID	Description
EQT 0010	9 - Glycol Reboiler - Stills Column	Controlled by	EQT 0021	21 - Glycol Reboiler - Condenser Vent
EQT 0021	21 - Glycol Reboiler - Condenser Vent	Controlled by	EQT 0013	13 - Dehydrator Flare
EQT 0022	22 - Glycol Reboiler - Flash Separator Vent	Controlled by	EQT 0011	10 - Glycol Reboiler - Burner Stack

Subject Item Groups:

ID	Group Type	Group Description
UNF 0001	Unit or Facility Wide	- Avery Island FWU & Compressor Station No. 1

Group Membership:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0043	0043 Crude Oil and Natural Gas Production (Greater than 500 T/Yr Source)		

SIC Codes:

1311	Crude petroleum and natural gas	AI 8073	
1311	Crude petroleum and natural gas	UNF 001	

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0043	0043 Crude Oil and Natural Gas Production (Greater than 500 T/Yr Source)		

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 8073 - Avery Island FWU & Compressor Station #1

Activity Number: PER20080001

Permit Number: 1260-00069-V3

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
Avery Island FWU & Compressor Station No. 1															
EQT 0001 ₁₁	1.29	1.29	5.64	18.19	79.69	0.07	0.07	0.29	0.01	0.01	0.02	0.21	0.21	0.91	
EQT 0002 ₁₂	12.02	12.02	52.64	36.88	161.54	0.08	0.08	0.33	0.01	0.01	0.02	0.24	0.24	1.04	
EQT 0003 ₁															
EQT 0004 ₂															
EQT 0005 ₃													0.53	0.53	2.31
EQT 0006 ₄													0.53	0.53	2.31
EQT 0008 ₆													0.15	0.15	0.67
EQT 0009 ₇													7.64	7.64	33.44
EQT 0011 ₁₀	0.04	0.04	0.15	0.04	0.04	0.18	<0.01	<0.01	0.01				<0.01	<0.01	0.01
EQT 0012 ₁₄													5.49	5.49	5.00
EQT 0013 ₁₃	0.38	0.38	1.64	0.07	0.07	0.30	0.01	0.01	0.04				0.05	0.05	0.23
EQT 0016 ₈													0.25	0.25	0.55
EQT 0017 ₁₇	0.04	0.04	0.15	0.04	0.04	0.18	<0.01	<0.01	0.01	<0.01	<0.01		12.16	12.16	0.68
EQT 0019 ₁₉													6.08	6.08	2.22
EQT 0020 ₂₀													0.01	0.01	0.04
EQT 0021 ₂₁													<0.01	<0.01	0.01
FUG 0001 _{F1}													40.40	40.40	3.39
RLP 0030 ₁₅															

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 8073 - Avery Island FWU & Compressor Station #1

Activity Number: PER20080001

Permit Number: 1260-00069-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0001 11	Benzene	0.01	0.01	0.05
	Formaldehyde	0.14	0.14	0.63
	Toluene	0.01	0.01	0.02
	Xylene (mixed isomers)	<0.01	<0.01	0.01
EQT 0002 12	Benzene	0.01	0.01	0.06
	Formaldehyde	0.16	0.16	0.72
	Toluene	0.01	0.01	0.02
	Xylene (mixed isomers)	<0.01	<0.01	0.01
EQT 0003 1	Toluene	<0.01	<0.01	<0.01
	Xylene (mixed isomers)	<0.01	<0.01	0.01
	n-Hexane	0.04	0.04	0.16
EQT 0004 2	Toluene	<0.01	<0.01	<0.01
	Xylene (mixed isomers)	<0.01	<0.01	0.01
	n-Hexane	0.04	0.04	0.16
EQT 0005 3	n-Hexane	0.01	0.01	0.02
EQT 0006 4	n-Hexane	0.01	0.01	0.02
EQT 0008 6	n-Hexane	<0.01	<0.01	0.01
EQT 0009 7	Ethyl benzene	<0.01	<0.01	<0.01
	Toluene	<0.01	<0.01	0.01
	Xylene (mixed isomers)	<0.01	<0.01	0.01
	n-Hexane	0.07	0.07	0.31
EQT 0011 10	n-Hexane	<0.01	<0.01	0.01
EQT 0012 14	Ethyl benzene	<0.01	<0.01	<0.01
	Toluene	<0.01	<0.01	<0.01
	Xylene (mixed isomers)	<0.01	<0.01	<0.01
	n-Hexane	0.05	0.05	0.05
EQT 0016 8	Benzene	<0.01	<0.01	<0.01
	Toluene	<0.01	<0.01	<0.01
	Xylene (mixed isomers)	<0.01	<0.01	<0.01
	n-Hexane	0.01	0.01	0.01
EQT 0017 17	n-Hexane	0.01	0.01	0.03
EQT 0019 19	Benzene	0.03	0.03	<0.01
	Ethyl benzene	0.01	0.01	<0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 8073 - Avery Island FWU & Compressor Station #1

Activity Number: PER20080001

Permit Number: 1260-00069-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0019 19	Toluene	0.06	0.06	<0.01
	Xylene (mixed isomers)	0.06	0.06	<0.01
	n-Hexane	0.21	0.21	0.01
EQT 0020 20	Benzene	0.02	0.02	0.01
	Ethyl benzene	0.01	0.01	<0.01
	Toluene	0.03	0.03	0.01
	Xylene (mixed isomers)	0.03	0.03	0.01
	n-Hexane	0.11	0.11	0.04
EQT 0021 21	Benzene	<0.01	<0.01	<0.01
	Toluene	<0.01	<0.01	<0.01
FUG 0001 F1	Benzene	<0.01	<0.01	<0.01
	n-Hexane	<0.01	<0.01	<0.01
RLP 0030 15	Benzene	0.11	0.11	0.01
	Ethyl benzene	0.04	0.04	<0.01
	Toluene	0.20	0.20	0.02
	Xylene (mixed isomers)	0.20	0.20	0.02
	n-Hexane	0.69	0.69	0.06
UNF 0001	Benzene			0.13
	Formaldehyde			1.35
	Toluene			0.07
	Xylene (mixed isomers)			0.06
	n-Hexane			0.88

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

All ID: 8073 - Avery Island FWU & Compressor Station #1
Activity Number: PER20080001
Permit Number: 1260-00069-V3
Air - Title V Regular Permit Renewal

EQT 0001 11 - Compressor Engine - 880 HP (Cooper)

- 1 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: None specified
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: Six-minute average
- 2 [LAC 33:III.1311.C] Stack gas concentration: Oxygen monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days). Maintain concentrations of O₂ in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
 Which Months: All Year Statistical Basis: None specified
 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater than 80% of maximum permitted capacity. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60.
- 3 [LAC 33:III.507.H.1.a] Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Air Quality Assessment Division. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- 4 [LAC 33:III.507.H.1.a] Stack gas concentration: Carbon monoxide monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
 Which Months: All Year Statistical Basis: None specified
 Submit notification: Due at least 30 days prior to any LDEQ required performance/emissions test to the Office of Environmental Assessment, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 5 [LAC 33:III.507.H.1.a] Stack gas concentration: Nitrogen oxides monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days). Maintain concentrations of NO_x in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
 Which Months: All Year Statistical Basis: None specified
 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment. The test results summary shall include any necessary conversion into the units of any applicable Standard. (lbs/MMBtu, gr/dscf, lbs SO₂ / ton 100% H₂SO₄, Etc.) Plant and in house laboratory data to support production values shall be included. (Example: how many tons of 100% equivalent H₂SO₄ was being produced) Units tested at less than 95% of permitted maximum capacity shall provide documentation to support compliance at 100% of the permitted maximum capacity.
 Equipment/operational data recordkeeping by electronic or hard copy semiannually. Recorded parameters are NO_x, CO, O₂, SO₂ and VOC concentrations in the stack gas obtained during semiannual testing.
- 6 [LAC 33:III.507.H.1.a]
- 7 [LAC 33:III.507.H.1.a]
- 8 [LAC 33:III.507.H.1.a]
- 9 [LAC 33:III.507.H.1.a]

SPECIFIC REQUIREMENTS

AI ID: 8073 - Avery Island FWU & Compressor Station #1
Activity Number: PER20080001
Permit Number: 1260-00069-V3
Air - Title V Regular Permit Renewal

EQT 0002 12 - Compressor Engine - 1000 HP (Clark)

- 10 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: None specified
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: Six-minute average
- 11 [LAC 33:III.1311.C] Stack gas concentration: Carbon monoxide monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
 Which Months: All Year Statistical Basis: None specified
 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment. The test results summary shall include any necessary conversion into the units of any applicable Standard. (lbs/MMBtu, gr/dscf, lbs SO₂ / ton 100% H₂SO₄, Etc.) Plant and in house laboratory data to support production values shall be included. (Example: how many tons of 100% equivalent H₂SO₄ was being produced) Units tested at less than 95% of permitted maximum capacity shall provide documentation to support compliance at 100% of the permitted maximum capacity.
- Equipment/operational data recordkeeping by electronic or hard copy semiannually. Recorded parameters are NO_x, CO, O₂, SO₂ and VOC concentrations in the stack gas obtained during semiannual testing.
- 12 [LAC 33:III.507.H.1.a] Stack gas concentration: Nitrogen oxides monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days). Maintain concentrations of NO_x in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
 Which Months: All Year Statistical Basis: None specified
 Submit notification: Due at least 30 days prior to any LDEQ required performance/emissions test to the Office of Environmental Assessment, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 13 [LAC 33:III.507.H.1.a] Stack gas concentration: Oxygen monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days). Maintain concentrations of O₂ in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
 Which Months: All Year Statistical Basis: None specified
 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater than 80% of maximum permitted capacity. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Air Quality Assessment Division. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- 14 [LAC 33:III.507.H.1.a]
- 15 [LAC 33:III.507.H.1.a]
- 16 [LAC 33:III.507.H.1.a]
- 17 [LAC 33:III.507.H.1.a]
- 18 [LAC 33:III.507.H.1.a]

SPECIFIC REQUIREMENTS

AI ID: 8073 - Avery Island FWU & Compressor Station #1
Activity Number: PER20080001
Permit Number: 1260-00069-V3
Air - Title V Regular Permit Renewal

EQT 0010 9 - Glycol Reboiler - Stills Column

- 19 [40 CFR 63.774(d)] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep records of the information specified in 40 CFR 63.774(d)(1)(i) or (d)(1)(ii), as applicable. Subpart HH. [40 CFR 63.774(d)] VOC, Total $\geq 85\%$ reduction using a control device. Demonstrate percent reduction using the methods found in LAC 33:III.2116.D.
 Which Months: All Year Statistical Basis: None specified
 Presence of a flame monitored by visual inspection/determination daily.
 Which Months: All Year Statistical Basis: None specified
 Flare gas: Heat content > 300 BTU/scf.
 Which Months: All Year Statistical Basis: None specified
 Determine compliance with LAC 33:III.2116.B using the methods in LAC 33:III.2116.D.1-5, as appropriate.
 Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep records of the information specified in LAC 33:III.2116.F.1 and 2.
 Vent from the still column shall be routed through a condenser. Noncondensibles shall be destroyed using a flare.

EQT 0011 10 - Glycol Reboiler - Burner Stack

- 26 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: None specified
 Total suspended particulate ≤ 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: None specified

EQT 0013 13 - Dehydrator Flare

- 28 [LAC 33:III.1105] Submit notification: Due to SPOC as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33:I.3923. Notification is required only if the upset cannot be controlled in six hours.
 Opacity ≤ 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.
 Which Months: All Year Statistical Basis: None specified
 Opacity ≤ 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
 Which Months: All Year Statistical Basis: Six-minute average
 Develop a corrective action plan for re-lighting the flare. Plan must be kept readily available for immediate implementation in the event the flare needs to be re-lit.
 Flare gas: Heat content > 300 BTU/scf, to ensure destruction of emissions to the flare stack.
 Which Months: All Year Statistical Basis: None specified
 Presence of a flame monitored by visual inspection/determination daily.
 Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS**AI ID: 8073 - Avery Island FWU & Compressor Station #1****Activity Number: PER2008001****Permit Number: 1260-00069-V3****Air - Title V Regular Permit Renewal****EQT 0013 13 - Dehydrator Flare**

- 34 [LAC 33:III.501.C.6] Flare gas: Heat content monitored by gas analysis annually, to insure the heat content is above 300 BTU/scf.
Which Months: All Year Statistical Basis: None specified
- 35 [LAC 33:III.501.C.6] Presence of a flame recordkeeping by electronic or hard copy daily.
- 36 [LAC 33:III.501.C.6] Flare gas: Heat content recordkeeping by electronic or hard copy annually.
- 37 [LAC 33:III.905] Shall comply with heat content limit, monitoring, recordkeeping, and reporting requirement as specified for this flare.

EQT 0017 17 - Heater Treater - Vent

- 38 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lanceing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
- 39 [LAC 33:III.1313.C] Which Months: All Year Statistical Basis: None specified
Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified

FUG 0001 F1 - Fugitive Emissions

- 40 [LAC 33:III.2111] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.

UNF 0001 - Avery Island FWU & Compressor Station No. 1

- 41 [40 CFR 70.5(a)(1)(iii)] Submit Title V permit application for renewal: Due 6 months before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 42 [40 CFR 70.6(a)(3)(iii)(A)] Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 43 [40 CFR 70.6(a)(3)(iii)(B)] Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. [40 CFR 70.6(a)(3)(iii)(B)]
- 44 [40 CFR 70.6(c)(5)(iv)] Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]

SPECIFIC REQUIREMENTS

AI ID: 8073 - Avery Island FWU & Compressor Station #1
 Activity Number: PER20080001
 Permit Number: 1260-00069-V3
 Air - Title V Regular Permit Renewal

UNF 0001 - Avery Island FWU & Compressor Station No. 1

- 45 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 46 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 47 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 48 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 49 [LAC 33:III.2119] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 50 [LAC 33:III.507.E.4] Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
- 51 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 52 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 53 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 54 [LAC 33:III.5113.A.1] Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 55 [LAC 33:III.5113.A.2] Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 56 [LAC 33:III.5117.A.1] Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III.Chapter 5 prior to approval by the permitting authority.
- 57 [LAC 33:III.5117.A.2] Submit permit application: Due by the date established for submittal in accordance with LAC 33:III.507.C. The permit application is for an initial permit to be issued in accordance with LAC 33:III.507. Provide a copy of each permit application pertaining to a major Part 70 source to EPA at the time of application submittal to the permitting authority.
- 58 [LAC 33:III.5117.B.1] Any application form, report, or compliance certification submitted under this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the application are true, accurate, and complete.
- 59 [LAC 33:III.5117.C] Submit supplementary facts or corrected information: Due promptly upon becoming aware of failure to submit or incorrect submittal regarding permit applications. In addition, provide information as necessary to address any requirements that become applicable to the source after the date of filing a complete application but prior to release of a proposed permit.

SPECIFIC REQUIREMENTS

AI ID: 8073 - Avery Island FWU & Compressor Station #1
 Activity Number: PER20080001
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 Air - Title V Regular Permit Renewal

UNF 0001 - Avery Island FWU & Compressor Station No. 1

- 60 [LAC 33:III.517.D] Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:III Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18. In addition to those elements listed under LAC 33:III.517.D, include in each application pertaining to a Part 70 source the information specified in LAC 33:III.517.E, Subparagraphs 1-8.
- 61 [LAC 33:III.517.E] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency. Due within 30 days after requested by the administrative authority.
- 62 [LAC 33:III.517.A] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 63 [LAC 33:III.5611.B] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.
- 64 [LAC 33:III.905] Submit Emission Inventory (EI)/Annual Emissions Statement Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.